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FEB - 8 2006

FCC - MAILROOM

Marlene H. Dortch Office of the Secretary Federal Communications Commission

445 12th Street, SW Washington, DC 20554 DOCKEL HIS COLA CHOWN

Re: EB Docket No. 06-36 and EB-06-TC-060, Certification of CPNI Filing 2006

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2006", as ordered in EB Docket No. 06-36 and EB-06-TC-060.

Company Name(s): New Ulm Telecom, Inc. – ILEC

New Ulm Telecom, Inc. - CLEC Western Telephone Company **Peoples Telephone Company** New Ulm Long Distance, Inc. New Ulm Phonery, Inc. New Ulm Cellular #9. Inc.

**Address** 

27 North Minnesota Street

City, State

New Ulm, MN 56073

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 et seq., as revised.

The attached Statement demonstrates such compliance.

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Attachment

Corporate Headquarters New Ulm Telecom, Inc. 27 N. Minnesota St. New Ulm, MN 56073 Voice: 507 354-4111

Fax: 507 354-1982

Redwood Falls NU-Telecom 137 East 2<sup>nd</sup> St. Redwood Falls, MN 56283 Voice: 507 627-4111 Fax: 507 627-4110

Springfield NU-Telecom 22 South Marshall St. Springfield, MN 56087 Voice: 507 723-4211 Fax: 507 723-4377

Aurelia, IA NU-Telecom 221 Main St. Aurelia, IA 51005 Voice: 712 434-5989 Fax: 712 434-5555

Website: www.newulmtel.net

cc: Byron McCoy
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## Statement of Explanation: CPNI Compliance

This accompanying statement explains how the following named company's operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U - Customer Proprietary Network Information - Part 64 of Title 47 of the Code of Federal Regulations.

New Ulm Telecom, Inc. – ILEC New Ulm Telecom, Inc. – CLEC Western Telephone Company Peoples Telephone Company New Ulm Long Distance, Inc. New Ulm Phonery, Inc. New Ulm Cellular #9, Inc.

The above listed companies adhere to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Specifically, our notice for CPNI approval meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- the training of appropriate personnel as to when they are, and are not, authorized to use confidential information, including CPNI;
- the implementation of an express disciplinary process for confidential information use violations, including CPNI;
- the implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- the maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
- the establishment of a supervisory review process regarding carrier compliance with the use of confidential information, including federal CPNI rules for outbound marketing situations; and
- the establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules.